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ATTORNEYS

6000 Poplar Avenue, Suite 400
Memphis, Tennessee 38119
P 901.525.1322 F 901.525.2389
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Tax ID No.: 62-0148660

September 22, 2023

Invoice No. 382205

Lake District, LLC
c/o Yehuda Netanel
5959 Topanga Canyon Blvd., Suite 285
Woodland Hills, CA 91367-7514

Lake District, LLC

Regarding: Chapter 11 Bankruptcy
Our Reference No. 26476.70906

FOR LEGAL SERVICES RENDERED AND ENTERED THROUGH 09/13/23	\$159,646.50
DISBURSEMENTS THROUGH 09/13/23	\$11,167.79
INVOICE TOTAL	<u>\$170,814.29</u>

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ITEMIZED SERVICES

DATE	DESCRIPTION	TASK	ATTY	HOURS	RATE	AMOUNT
03/23/23	Conference with Netanel; work on schedules; research lien priority	B110	MPC	2.30	500.00	1,150.00
03/30/23	Emails with client re IDI and required documents.	B110	RXH	0.30	350.00	105.00
03/31/23	Telephone from Yehuda Netanel (.5) re calls to Patterson and Bright; telephone to Patterson and Bright (.4)	B110	MPC	0.90	500.00	450.00
04/03/23	Telephone with Patterson and Netanel re Lakeland (.2); telephone with Patterson, Roman, Netanel and Walker re Lakeland (.4)	B110	MPC	0.60	500.00	300.00
04/04/23	Prepared documents for IDI.	B110	RXH	1.00	350.00	350.00

04/04/23	Case 23-21496, Doc 183 Filed 09/22/23 Entered 09/22/23 09:47:14 Desc Main Document Page 3 of 22 Attended IDI.	B110	RXH	1.50	350.00	525.00
04/04/23	Emails with UST's office re IDI.	B110	RXH	0.50	350.00	175.00
04/06/23	Emails with client re documents required by US Trustee.	B110	RXH	0.20	350.00	70.00
04/11/23	Review CC budget to actual report and emails to and from Netanel re same; telephone calls to Netanel; emails to and from Hirsch	B110	MPC	0.70	500.00	350.00
04/11/23	Prepared IDI documents for UST.	B110	RXH	0.30	350.00	105.00
04/12/23	Telephone call with Netanel and prospective lender	B110	MPC	0.70	500.00	350.00
04/19/23	Emails with client re proof of insurance for UST.	B110	RXH	0.30	350.00	105.00
04/20/23	Emails with client re IDI required documents.	B110	RXH	0.20	350.00	70.00
04/27/23	Telephone with Turpin re budget reports	B110	MPC	0.30	500.00	150.00
05/25/23	Communications with client re items required for IDI.	B110	RXH	0.50	350.00	175.00
05/26/23	Emails with client re documents required for IDI.	B110	RXH	0.30	350.00	105.00
05/31/23	Gathered materials for IDI.	B110	RXH	1.00	350.00	350.00
05/31/23	Emails with UST re IDI documents.	B110	RXH	0.30	350.00	105.00
06/05/23	Zoom call with Bright and Patterson re TIF (.4); telephone with Netanel re same (.4)	B110	MPC	0.80	500.00	400.00
06/22/23	Attend status conference	B110	MPC	0.75	500.00	375.00
06/22/23	Attended status conference.	B110	RXH	1.50	350.00	525.00
06/23/23	Phone call with client re monthly operating reports.	B110	RXH	0.30	350.00	105.00
07/03/23	Prepared monthly operating reports.	B110	RXH	1.00	350.00	350.00
07/06/23	Prepared monthly operating reports.	B110	RXH	0.50	350.00	175.00
07/07/23	Prepared and filed monthly operating reports for March through May.	B110	RXH	1.50	350.00	525.00

07/14/23	Prepared and filed monthly operating report.	B110	RXH	0.50	350.00	175.00
07/19/23	Phone call with UST re upcoming hearing on motion to dismiss.	B110	RXH	0.10	350.00	35.00
07/20/23	Attended hearing on motion to sell property.	B110	RXH	0.50	350.00	175.00
08/15/23	Prepared and filed monthly operating report.	B110	RXH	0.50	350.00	175.00
09/08/23	Emails with client re monthly operating report.	B110	RXH	0.50	350.00	175.00
06/08/23	Meeting with Netanel, Patterson, Bright and Roman	B130	MPC	1.50	500.00	750.00
06/12/23	Work on CFA motion to sell; emails to and from Parrish; review Fifth Amendment	B130	MPC	2.00	500.00	1,000.00
06/12/23	Phone conference with Coury re motion to sell property.	B130	RXH	0.20	350.00	70.00
06/19/23	Revise and file Chick Fil A sale motion	B130	MPC	0.50	500.00	250.00
07/18/23	Reviewed objection to motion to sell property.	B130	RXH	0.50	350.00	175.00
07/19/23	Emails with opposing counsel re upcoming hearing on motion to sell property.	B130	RXH	0.20	350.00	70.00
08/11/23	Telephone calls to Netanel re Lakeland and LRK; telephone to Bright	B130	MPC	0.50	500.00	250.00
08/11/23	Emails re letters of intent.	B130	RXH	0.30	350.00	105.00
08/18/23	Emails re lien releases on parcel of landing being sold.	B130	RXH	0.40	350.00	140.00
08/30/23	Review and upload 6th amendment and CFA order (.3); email to and from counsel for Carr Inc.; prepare and file change of address for Carr (.4)	B130	MPC	0.70	500.00	350.00
09/11/23	Virtual conference with opposing counsel re sale order.	B130	RXH	0.50	350.00	175.00
03/28/23	Emails to Clift and from Waldrop; telephone conference with Netanel;	B140	MPC	1.00	500.00	500.00
04/21/23	Begin review of motion and appraisal; telephone conference with Netanel and	B140	MPC	1.00	500.00	500.00

04/25/23	Conference with Coury re drafting Response to Motion for Relief From Stay.	B140	RXH	0.30	350.00	105.00
04/27/23	Phone conference with client re relief from stay motion.	B140	RXH	0.20	350.00	70.00
04/27/23	Conference with Coury re relief from stay motion.	B140	RXH	0.30	350.00	105.00
04/28/23	Conference with Netanel re pending matters	B140	MPC	3.00	500.00	1,500.00
04/28/23	Conference with Coury and client re Response to Motion for Relief From Stay.	B140	RXH	3.00	350.00	1,050.00
04/28/23	Research re assignment of contract and affect on valuation.	B140	RXH	1.00	350.00	350.00
04/29/23	Review appraisals	B140	MPC	2.00	500.00	1,000.00
05/01/23	Telephone conference with Muller (.5); review Legalist docs (1.0); meet with Netanel(1.2) finish review of Legalist and email to Netanel (.50)	B140	MPC	3.20	500.00	1,600.00
05/01/23	Drafted declaration of Mr. Netanel in opposition to motion for relief from stay.	B140	RXH	3.00	350.00	1,050.00
05/01/23	Phone conference with Dexter Mullins re TIF.	B140	RXH	0.50	350.00	175.00
05/01/23	Conference with client and Coury re opposing motion for relief from stay.	B140	RXH	2.00	350.00	700.00
05/02/23	Research re stay issues (.75); emails to and from Davey and Netanel; emails to and from Becky; email to Hirsch	B140	MPC	1.50	500.00	750.00
05/02/23	Drafted response to motion for relief from stay.	B140	RXH	5.00	350.00	1,750.00
05/03/23	Drafted declaration of Yehuda Netanel.	B140	RXH	1.20	350.00	420.00
05/03/23	Drafted declaration of John Praytor.	B140	RXH	1.00	350.00	350.00
05/03/23	Phone call with client re upcoming hearing on motion for relief from stay.	B140	RXH	0.30	350.00	105.00
05/03/23	Conference with Coury re responding to motion for relief from stay.	B140	RXH	0.70	350.00	245.00

05/03/23	Drafted response to motion for relief from stay.	B140	RXH	1.20	350.00	420.00
05/04/23	Telephone to Praytor re schedule and appraisals (.5); email from Waldrop and review discovery (.25); telephone with Netanel and Hutchens re same (.25); work on DIP motion and docs (3.0); telephone conference with Netanel and Hutchens (1.0)	B140	MPC	4.75	500.00	2,375.00
05/04/23	Phone conference with client re declaration for hearing on motion for relief from stay.	B140	RXH	0.70	350.00	245.00
05/04/23	Phone conference with client re responses to discovery requests.	B140	RXH	1.10	350.00	385.00
05/04/23	Drafted declaration of Yehuda for hearing on motion for relief from stay.	B140	RXH	0.30	350.00	105.00
05/04/23	Drafted declaration of appraiser for hearing on motion for relief from stay.	B140	RXH	0.60	350.00	210.00
05/04/23	Drafted discovery requests to Romspen re motion for relief from stay.	B140	RXH	0.70	350.00	245.00
05/04/23	Drafted response to motion for relief from stay.	B140	RXH	2.50	350.00	875.00
05/05/23	Continue revision of Leglaist DIP motion (1.5) email to Davey re same (.1) ; email to Netanel re same (.2); review Romspen claim (.2); telephone conference with Lock Waldrop and Clift re scheduling order and review revised order (.70) ; telephone conference with Netanel and Hutchens re case status (.4)	B140	MPC	3.10	500.00	1,550.00
05/05/23	Phone call with opposing counsel re upcoming hearing on motion for relief from stay.	B140	RXH	0.50	350.00	175.00
05/05/23	Emails with client re response to motion for summary judgment.	B140	RXH	0.30	350.00	105.00
05/05/23	Drafted response to motion for relief from stay.	B140	RXH	4.20	350.00	1,470.00
05/05/23	Research re response to motion for relief from stay.	B140	RXH	1.90	350.00	665.00

05/06/23	Case 23-21496 Doc 183 Filed 09/22/23 Entered 09/22/23 09:47:14 Desc Main Document Page 7 of 22 Work on Yehuda declaration and emails to Yehuda	B140	MPC	2.00	500.00	1,000.00
05/06/23	Drafted response to motion for relief from stay and accompanying documents.	B140	RXH	2.00	350.00	700.00
05/08/23	Conference with Coury re discovery related to motion for relief from stay.	B140	RXH	0.50	350.00	175.00
05/08/23	Prepare documents for production to opposing counsel.	B140	MB	0.40	220.00	88.00
05/09/23	Phone call with client re declaration.	B140	RXH	1.20	350.00	420.00
05/09/23	Phone call with client re declaration.	B140	RXH	0.20	350.00	70.00
05/09/23	Drafted declaration of Dexter of Muller re TIF.	B140	RXH	1.50	350.00	525.00
05/09/23	Drafted witness/exhibit list.	B140	RXH	1.20	350.00	420.00
05/09/23	Research re filing a plan in a single asset real estate case.	B140	RXH	0.30	350.00	105.00
05/09/23	Drafted declaration of appraiser.	B140	RXH	0.50	350.00	175.00
05/09/23	Prepared discovery responses.	B140	RXH	0.50	350.00	175.00
05/10/23	Review and revise declarations and draft response; emails to and from Yehuda and Becky Pendleton	B140	MPC	3.00	500.00	1,500.00
05/10/23	Phone call with client re discovery responses.	B140	RXH	1.30	350.00	455.00
05/10/23	Virtual meeting with appraisers re upcoming depositions.	B140	RXH	2.50	350.00	875.00
05/10/23	Emails with expert re declaration.	B140	RXH	0.30	350.00	105.00
05/10/23	Drafted declaration of Dexter Muller.	B140	RXH	1.20	350.00	420.00
05/10/23	Drafted discovery responses.	B140	RXH	1.60	350.00	560.00
05/10/23	Drafted declaration of Yehuda Netanel.	B140	RXH	1.00	350.00	350.00
05/10/23	Prepared exhibits to file with response to motion for relief from stay.	B140	RXH	0.20	350.00	70.00
05/11/23	Prepared responses to discovery requests.	B140	RXH	5.00	350.00	1,750.00

05/11/23	Drafted declaration of Yehuda Netanel.	B140	RXH	1.30	350.00	455.00
05/11/23	Drafted declaration of Dexter Muller.	B140	RXH	1.20	350.00	420.00
05/11/23	Phone conference with client re discovery responses.	B140	RXH	0.30	350.00	105.00
05/11/23	Emails with client re discovery responses.	B140	RXH	0.60	350.00	210.00
05/11/23	Prepare documents for production to opposing counsel.	B140	MB	2.30	220.00	506.00
05/12/23	Prepare for and attend depositions of Roitman and Praytor	B140	MPC	8.00	500.00	4,000.00
05/12/23	Attended the deposition of John Praytor.	B140	RXH	4.60	350.00	1,610.00
05/12/23	Attended the deposition of Roitman.	B140	RXH	1.50	350.00	525.00
05/12/23	Phone call with outside counsel re discovery responses.	B140	RXH	0.20	350.00	70.00
05/12/23	Emails with opposing counsel re discovery requests.	B140	RXH	0.30	350.00	105.00
05/13/23	Deposition prep with Netanel and document supplementation	B140	MPC	4.00	500.00	2,000.00
05/13/23	Met with client to prepare for depositions and trial on motion for relief from stay.	B140	RXH	4.00	350.00	1,400.00
05/14/23	Depo prep for Neyhart	B140	MPC	6.00	500.00	3,000.00
05/15/23	Attended various depositions re motion for relief from stay.	B140	RXH	9.50	350.00	3,325.00
05/16/23	Attend Praytor deposition; trial prep	B140	MPC	5.00	500.00	2,500.00
05/16/23	Prepared exhibits and exhibit list for upcoming trial on motion for relief from stay.	B140	RXH	4.00	350.00	1,400.00
05/16/23	Drafted joint pretrial statement.	B140	RXH	2.00	350.00	700.00
05/16/23	Emails with opposing counsel re joint pretrial statement.	B140	RXH	0.50	350.00	175.00
05/16/23	Phone conference with expert re exhibits.	B140	RXH	0.30	350.00	105.00
05/17/23	Trial prep	B140	MPC	6.00	500.00	3,000.00

05/17/23	Prepared for trial on motion for relief from stay.	B140	RXH	7.00	350.00	2,450.00
05/17/23	Drafted supplemental declaration of John Praytor and accompanying exhibits.	B140	RXH	1.00	350.00	350.00
05/18/23	Prepare for and attend trial	B140	MPC	8.00	500.00	4,000.00
05/18/23	Met with expert witness to prepare for trial.	B140	RXH	2.00	350.00	700.00
05/18/23	Appeared at trial on motion for relief from stay.	B140	RXH	6.00	350.00	2,100.00
05/19/23	Attend trial	B140	MPC	7.00	500.00	3,500.00
05/19/23	Appeared for trial on motion for relief from stay.	B140	RXH	7.00	350.00	2,450.00
05/24/23	Emails re redlined versions of exhibits.	B140	RXH	0.30	350.00	105.00
06/02/23	Prepared post-trial brief for relief from stay motion.	B140	RXH	3.00	350.00	1,050.00
06/05/23	Drafted post-trial brief.	B140	RXH	4.00	350.00	1,400.00
06/06/23	Drafted post-trial brief.	B140	RXH	3.00	350.00	1,050.00
06/07/23	Drafted post-trial brief for motion for relief from stay.	B140	RXH	4.00	350.00	1,400.00
06/08/23	Drafted post-trial brief on motion for relief from stay.	B140	RXH	5.00	350.00	1,750.00
06/09/23	Drafted post-trial brief on motion for relief from stay.	B140	RXH	4.00	350.00	1,400.00
06/12/23	Drafted post-trial brief on motion for relief from stay.	B140	RXH	4.50	350.00	1,575.00
06/13/23	Drafted post-trial brief on motion for relief from stay.	B140	RXH	1.50	350.00	525.00
06/14/23	Drafted post-trial brief.	B140	RXH	2.00	350.00	700.00
06/16/23	Drafted and filed post-trial brief.	B140	RXH	2.00	350.00	700.00
06/20/23	Phone calls with law clerk re providing post trial brief in Word form.	B140	RXH	0.30	350.00	105.00
06/28/23	Reviewed the court's decision on the motion	B140	RXH	0.50	350.00	175.00

06/28/23	Phone conference with client re opinion on motion for relief from stay.	B140	RXH	0.50	350.00	175.00
07/18/23	Reviewed motion to reconsider order denying motion for relief from stay.	B140	RXH	1.00	350.00	350.00
07/19/23	Drafted response to motion to reconsider relief from stay motion.	B140	RXH	1.30	350.00	455.00
07/20/23	Drafted response to motion to reconsider.	B140	RXH	2.00	350.00	700.00
07/21/23	Drafted response to motion to reconsider order denying relief from the stay.	B140	RXH	4.00	350.00	1,400.00
07/25/23	Work on response to Motion to Reconsider	B140	MPC	1.00	500.00	500.00
07/25/23	Research re standard for a motion to reconsider.	B140	RXH	1.30	350.00	455.00
07/26/23	Telephone conference with Netanel re LOL's	B140	MPC	0.40	500.00	200.00
07/26/23	Drafted objection to motion for reconsideration.	B140	RXH	1.00	350.00	350.00
07/26/23	Emails re letters of intent.	B140	RXH	0.30	350.00	105.00
07/27/23	Draft Declaration; telephone conference with Netanel re same; review draft response;	B140	MPC	2.00	500.00	1,000.00
07/27/23	Drafted objection and supporting documents to motion to reconsider.	B140	RXH	3.00	350.00	1,050.00
08/01/23	Reviewed reply filed by creditor re motion to reconsider.	B140	RXH	0.50	350.00	175.00
08/03/23	Prepare for and attend hearing on CFA sale, UST motion, motion to reconsider and disclosure statement	B140	MPC	6.00	500.00	3,000.00
08/03/23	Attended hearing on motion to reconsider motion for relief from stay/disclosure statement approval, etc.	B140	RXH	4.00	350.00	1,400.00
04/19/23	Confer with Netanel and prepare for and attend meeting of creditors	B150	MPC	4.00	500.00	2,000.00
04/11/23	Conference with Coury re application to be employed.	B160	RXH	0.30	350.00	105.00

04/12/23	Prepare GB application to employ and declaration	B160	MPC	0.70	500.00	350.00
04/20/23	Prepare application to employ appraiser and declaration of Praytor	B160	MPC	0.60	500.00	300.00
04/24/23	Drafted Application and accompanying Declaration to Hire Special Counsel.	B160	RXH	2.10	350.00	735.00
04/26/23	Revise and file Application to Employ Appraiser	B160	MPC	0.20	500.00	100.00
04/28/23	Emails with special counsel re application to employ.	B160	RXH	0.40	350.00	140.00
05/09/23	Emails with special counsel re motion to employ.	B160	RXH	0.40	350.00	140.00
05/24/23	Prepare order approving interim fee procedure motion	B160	MPC	0.40	500.00	200.00
05/24/23	Drafted order to employ John Praytor.	B160	RXH	0.30	350.00	105.00
03/28/23	Conference with Coury re assuming executory contracts.	B185	RXH	0.40	350.00	140.00
07/11/23	Telephone to Miller re Hollywood lease	B185	MPC	0.40	500.00	200.00
07/12/23	Telephone from Kulka re Hollywood lease(.40); telephone to Netanel re same and case status(.3)	B185	MPC	0.70	500.00	350.00
03/20/23	Revise budget and order; attend CC hearing; emails to and from counsel	B230	MPC	1.50	500.00	750.00
03/22/23	Research re appropriate equity cushion for a motion to obtain credit. Met with client re schedules and overall bankruptcy strategy. Drafted budget for Cash Collateral Order. Drafted Cash Collateral Motion.	B230	RXH	5.15	350.00	1,802.50
03/23/23	Updated budget for Cash Collateral Motion. Drafted Cash Collateral Motion.	B230	RXH	2.50	350.00	875.00
03/24/23	Finalized and filed Cash Collateral Motion and Order (1.1). Finalized and filed budget for Cash Collateral Motion (.5). Drafted Interim Order on Cash Collateral Motion (2.1). Emails	B230	RXH	5.00	350.00	1,750.00

with co-counsel re same (.2). Drafted letter to tenant re offsetting rent and the automatic stay (1). Phone call with client re budget (.1).

03/28/23	Phone call with client re Motion to Use Cash Collateral.	B230	RXH	0.20	350.00	70.00
03/28/23	Emails with opposing counsel re Motion to Use Cash Collateral.	B230	RXH	0.30	350.00	105.00
03/29/23	Emails and telephone to and from Waldrop, Hirsch and Rohrscheib re interim cash collateal; telephone conference with Netanel re same; telephone to Miller re litigation	B230	MPC	4.00	500.00	2,000.00
03/29/23	Prepared and filed Proposed Order to Cash Collateral Motion.	B230	RXH	0.20	350.00	70.00
03/29/23	Reviewed UST's Objection to Motion to Use Cash Collateral.	B230	RXH	0.30	350.00	105.00
03/30/23	Finalized and filed Order on Cash Collateral.	B230	RXH	0.30	350.00	105.00
04/03/23	Finalized and filed budget to cash collateral order.	B230	RXH	0.20	350.00	70.00
04/20/23	Review backup for budget and email to Hirsch re same; telephone to Netanel re same; email from and to Miller re Frida's settlement	B230	MPC	0.70	500.00	350.00
04/21/23	Phone call with opposing counsel re opposition to Motion to Use Cash Collateral.	B230	RXH	0.30	350.00	105.00
04/21/23	Conference with Coury re opposition to cash collateral motion.	B230	RXH	0.30	350.00	105.00
04/26/23	Emails to and from Netanel and Turpin re revisions to budget and projections and budget to actual (.5) telephone to Turpin (.3); telephone to Netanel(.3); emails to and from Hirsch (.5) revise order (.3); review appraisal (1.0)	B230	MPC	2.90	500.00	1,450.00
04/27/23	Court appearance re cash collateral motion (2.0) finalize and file CC order (.2); prepare and file order approving GB employment (.2); review Roitman declaration (.4); telephone with Netanel and Hutchens re same (.3);	B230	MPC	3.30	500.00	1,650.00

05/01/23	Work on DIP Motion	B230	MPC	1.50	500.00	750.00
05/23/23	Phone call with client re budget to actual for cash collateral.	B230	RXH	0.40	350.00	140.00
05/25/23	Reviewed proposed cash collateral budget.	B230	RXH	1.00	350.00	350.00
05/26/23	Emails with opposing counsel re cash collateral budget.	B230	RXH	0.30	350.00	105.00
05/30/23	Prepared revised budget for cash collateral	B230	RXH	1.00	350.00	350.00
05/30/23	Emails with client re new cash collateral budget.	B230	RXH	1.20	350.00	420.00
05/30/23	Emails with opposing counsel re cash collateral budget.	B230	RXH	0.70	350.00	245.00
05/30/23	Phone call with opposing counsel re cash collateral budget.	B230	RXH	0.40	350.00	140.00
05/30/23	Reviewed budget to actual report.	B230	RXH	0.30	350.00	105.00
06/06/23	Reviewed budget to actual report for cash collateral.	B230	RXH	0.30	350.00	105.00
06/07/23	Emails with client re questions regarding budget to actual report.	B230	RXH	0.30	350.00	105.00
06/14/23	Emails with opposing counsel re budget to actual report.	B230	RXH	0.20	350.00	70.00
06/14/23	Prepared and filed third interim cash collateral order.	B230	RXH	0.50	350.00	175.00
06/20/23	Phone call with client re budget to actual report.	B230	RXH	0.30	350.00	105.00
06/20/23	Emails with client re budget to actual report.	B230	RXH	0.30	350.00	105.00
06/20/23	Prepared budget to actual report.	B230	RXH	0.50	350.00	175.00
06/20/23	Emails with opposing counsel re budget to actual report.	B230	RXH	0.10	350.00	35.00
06/21/23	Phone call with client re cash collateral budget.	B230	RXH	0.10	350.00	35.00

06/21/23	Case 23-21496 Doc 183 Filed 09/22/23 Entered 09/22/23 09:47:14 Desc Main Document Page 14 of 22						105.00
06/27/23	Emails with client re cash collateral budget.	B230	RXH	0.50	350.00		175.00
06/27/23	Reviewed weekly budget to actual report.	B230	RXH	0.30	350.00		105.00
06/29/23	Emails with client re cash collateral budget.	B230	RXH	0.50	350.00		175.00
06/30/23	Emails with client re new proposed cash collateral budget.	B230	RXH	0.30	350.00		105.00
06/30/23	Reviewed proposed cash collateral budget.	B230	RXH	0.20	350.00		70.00
07/03/23	Emails with client re cash collateral report.	B230	RXH	0.30	350.00		105.00
07/03/23	Emails with opposing counsel re cash collateral reports.	B230	RXH	0.30	350.00		105.00
07/05/23	Provided weekly budget to actual report to opposing counsel.	B230	RXH	0.50	350.00		175.00
07/10/23	Emails with opposing counsel re cash collateral budget.	B230	RXH	0.20	350.00		70.00
07/11/23	Emails with opposing counsel re budget to actual report.	B230	RXH	0.30	350.00		105.00
07/12/23	Emails re cash collateral budget.	B230	RXH	0.30	350.00		105.00
07/14/23	Emails with client re weekly budget to actual reports.	B230	RXH	0.20	350.00		70.00
07/18/23	Prepared budget to actual report and emailed it to opposing counsel.	B230	RXH	0.30	350.00		105.00
07/18/23	Emails with client re cash collateral budget.	B230	RXH	0.20	350.00		70.00
07/20/23	Emails with client re cash collateral issues.	B230	RXH	0.30	350.00		105.00
07/21/23	Emails with client re cash collateral budget and expenses.	B230	RXH	1.00	350.00		350.00
07/21/23	Emails with opposing counsel re cash collateral budget and expenses.	B230	RXH	0.10	350.00		35.00
07/25/23	Emails with client re cash collateral budget.	B230	RXH	0.30	350.00		105.00
07/25/23	Emails with opposing counsel re proposed cash collateral budget.	B230	RXH	0.30	350.00		105.00

07/27/23	Reviewed new proposed cash collateral budget.	B230	RXH	0.30	350.00	105.00
07/27/23	Emails with opposing counsel re proposed cash collateral budget.	B230	RXH	0.10	350.00	35.00
08/01/23	Prepared weekly budget to actual and revenue tracking reports.	B230	RXH	0.50	350.00	175.00
08/02/23	Emails with client re amended cash collateral budget.	B230	RXH	0.50	350.00	175.00
08/02/23	Emails with opposing counsel re amended cash collateral budget.	B230	RXH	0.50	350.00	175.00
08/08/23	Prepared cash collateral budget to actual report.	B230	RXH	0.30	350.00	105.00
08/15/23	Prepared cash collateral reports.	B230	RXH	0.50	350.00	175.00
08/22/23	Prepared and provided cash collateral budget-to-actual reports.	B230	RXH	0.30	350.00	105.00
08/29/23	Prepared and emailed cash collateral reports.	B230	RXH	0.30	350.00	105.00
08/30/23	Emails with opposing counsel re budget-to-actual reports.	B230	RXH	0.60	350.00	210.00
09/05/23	Prepared cash collateral reports.	B230	RXH	0.50	350.00	175.00
09/08/23	Emails with client re cash collateral reports.	B230	RXH	0.20	350.00	70.00
09/12/23	Prepared weekly cash collateral reports.	B230	RXH	0.50	350.00	175.00
05/05/23	Phone conference with client re Romspen's proof of claim and the impact on filing a plan.	B320	RXH	0.60	350.00	210.00
06/02/23	Phone call with client re proposed plan.	B320	RXH	0.20	350.00	70.00
06/12/23	Phone conference with Coury re plan and disclosure statement.	B320	RXH	0.30	350.00	105.00
06/14/23	Research re default interest in plan.	B320	RXH	3.00	350.00	1,050.00
06/15/23	Drafted chapter 11.	B320	RXH	4.50	350.00	1,575.00
06/16/23	Drafted plan and disclosure statement.	B320	RXH	5.00	350.00	1,750.00
06/19/23	Drafted plan and disclosure statement.	B320	RXH	5.00	350.00	1,750.00

06/19/23	Conference with Coury re plan and disclosure statement.	B320	RXH	1.00	350.00	105.00
06/20/23	Review and revise plan; meet with Netanel and Hutchens	B320	MPC	3.00	500.00	1,500.00
06/20/23	Met with client re plan and disclosure statement.	B320	RXH	1.00	350.00	350.00
06/20/23	Conference with Coury re plan and disclosure statement.	B320	RXH	1.00	350.00	350.00
06/21/23	Met with client re plan.	B320	RXH	2.50	350.00	875.00
06/21/23	Drafted disclosure statement and plan.	B320	RXH	2.50	350.00	875.00
06/22/23	Finalized and filed proposed plan and disclosure statement.	B320	RXH	2.00	350.00	700.00
06/28/23	Research re classification of claims for confirmation purposes.	B320	RXH	1.00	350.00	350.00
06/30/23	Drafted and filed certificate of service for plan and disclosure statement.	B320	RXH	0.20	350.00	70.00
07/31/23	Reviewed objection to disclosure statement.	B320	RXH	1.00	350.00	350.00
07/31/23	Conference with Coury re objection to disclosure statement.	B320	RXH	1.50	350.00	525.00
07/31/23	Research re objection to disclosure statement.	B320	RXH	1.50	350.00	525.00
08/01/23	Phone conference with client re objection to disclosure statement.	B320	RXH	0.50	350.00	175.00
08/01/23	Conference with Coury re objection to disclosure statement.	B320	RXH	0.30	350.00	105.00
08/01/23	Research re confirming a liquidating plan.	B320	RXH	3.00	350.00	1,050.00
08/02/23	Conference with Coury re upcoming hearing on disclosure statement.	B320	RXH	1.00	350.00	350.00
08/02/23	Phone call with client re upcoming hearing on disclosure statement.	B320	RXH	0.20	350.00	70.00
08/02/23	Research re plan requirements.	B320	RXH	0.50	350.00	175.00
08/04/23	Emails with client re information for	B320	RXH	0.30	350.00	105.00

08/07/23	Phone call with client re projections for disclosure statement.	B320	RXH	0.20	350.00	70.00
08/07/23	Emails with client re financial projections for disclosure statement.	B320	RXH	0.30	350.00	105.00
08/07/23	Drafted amended disclosure statement.	B320	RXH	1.00	350.00	350.00
08/08/23	Drafted amended disclosure statement.	B320	RXH	2.00	350.00	700.00
08/09/23	Conference call with Nick Marcus and Ricky Hutchens re disclosure statement; confer with Hutchens re same	B320	MPC	0.75	500.00	375.00
08/09/23	Virtual conference with opposing counsel re amended disclosure statement.	B320	RXH	1.00	350.00	350.00
08/09/23	Drafted amended disclosure statement.	B320	RXH	2.50	350.00	875.00
08/10/23	Drafted disclosure statement and supporting documents.	B320	RXH	5.00	350.00	1,750.00
08/10/23	Emails with client re disclosure statement.	B320	RXH	0.60	350.00	210.00
08/10/23	Reviewed documents to support disclosure statement.	B320	RXH	0.80	350.00	280.00
08/11/23	Reviewed licensing agreement with LRK to determine if executory contract.	B320	RXH	0.60	350.00	210.00
08/11/23	Drafted disclosure statement.	B320	RXH	3.30	350.00	1,155.00
08/11/23	Conference with Coury re disclosure statement.	B320	RXH	0.30	350.00	105.00
08/14/23	Review and revise amended disclosure statement	B320	MPC	1.00	500.00	500.00
08/14/23	Drafted amended disclosure statement and accompanying exhibits.	B320	RXH	2.00	350.00	700.00
08/14/23	Emails with client re exhibit for amended disclosure statement.	B320	RXH	0.10	350.00	35.00
08/14/23	Emails with opposing counsel re amended disclosure statement.	B320	RXH	0.20	350.00	70.00
08/15/23	Revise disclosure statement	B320	MPC	0.30	500.00	150.00

08/15/23	Finalized and filed amended disclosure statement/plan and accompanying exhibits.	B320	RXH	3.30	350.00	1,155.00
08/15/23	Phone call with opposing counsel re executory contract issue.	B320	RXH	0.20	350.00	70.00
08/16/23	Phone call with opposing counsel re executory contracts and treatment under the plan.	B320	RXH	0.40	350.00	140.00
08/17/23	Prepare for and attend hearing on disclosure statement; draft amendment to disclosure statement	B320	MPC	2.00	500.00	1,000.00
08/17/23	Attended hearing on approving disclosure statement.	B320	RXH	1.50	350.00	525.00
08/17/23	Drafted second amended disclosure statement.	B320	RXH	0.60	350.00	210.00
08/18/23	Finalized and filed second amended disclosure statement and plan.	B320	RXH	0.60	350.00	210.00
08/22/23	Prepared ballots for voting.	B320	RXH	0.80	350.00	280.00
08/22/23	Prepared packets for sending out to creditors to vote on plan.	B320	RXH	1.00	350.00	350.00
08/22/23	Prepared amendment to second amended plan.	B320	RXH	0.20	350.00	70.00
08/23/23	Prepared voting packets to send to creditors.	B320	RXH	1.00	350.00	350.00
08/23/23	Drafted first amendment to second amended plan.	B320	RXH	0.50	350.00	175.00
08/24/23	Emails with client re potential sale/refinance options.	B320	RXH	0.20	350.00	70.00
08/25/23	Prepared and finalized voting packets for all classes.	B320	RXH	0.60	350.00	210.00
09/11/23	Phone call with client re soliciting votes for plan.	B320	RXH	0.60	350.00	210.00
09/12/23	Teams call with Wellford re LRK; emails to and from Hirsch and Parrish; prepare amended sale order	B320	MPC	0.70	500.00	350.00

09/12/23

Drafted second amendment to second amended plan.

B320 RXH

0.50

350.00

175.00

TOTAL FOR SERVICES

\$159,646.50

ATTORNEY	RANK	HOURS	RATE	TOTAL
Michael P. Coury	Member	118.85	\$500.00/hr.	\$59,425.00
Ricky L. Hutchens	Associate	284.65	\$350.00/hr.	\$99,627.50
Mandi Benson	Paralegal	2.70	\$220.00/hr.	\$594.00
TOTAL ATTORNEYS FEES				\$159,646.50

DATE	ITEMIZED DISBURSEMENTS DESCRIPTION	QTY	AMOUNT
03/27/23	Filing Fee [E112] PAYEE: Coury, Michael P.; REQUEST#: 223087; DATE: 3/27/2023. Reimbursement: Bankruptcy Filing Fee		\$1,738.00
03/27/23	Postage [E108] 47 @ \$0.60.		\$28.20
04/14/23	Postage [E108] 52 @ \$0.60.		\$31.20
04/21/23	Postage [E108] 51 @ \$0.60.		\$30.60
04/26/23	Postage [E108] 51 @ \$0.60.		\$30.60
05/15/23	Postage [E108] 51 @ \$0.84.		\$42.84
05/16/23	Breakfast/Lunch/Dinner Meeting [E111] PAYEE: Buttry, Lea W.; REQUEST#: 224141; DATE: 5/16/2023. - Reimbursement for Lunch for meeting with client.		\$42.19
05/17/23	Clerical Overtime [E124] Lea Buttry worked .5 hour of overtime		\$23.10
05/17/23	Transcript of Deposition [E115] VENDOR: Veritext; INVOICE#: 6571617; DATE: 5/17/2023;		\$2,327.50

05/17/23	Transcript of Deposition [E115] VENDOR: Veritext; INVOICE#: 6579814; DATE: 5/17/2023; Deposition of John Praytor - Vol. 2.	\$1,071.28
05/24/23	Transcript of Deposition [E115] VENDOR: Veritext; INVOICE#: 6580411; DATE: 5/24/2023; Depositions of Dexter Muller, Ron Neyhart and Yehuda Netanel.	\$2,582.36
06/01/23	Transcript of Proceedings [E116] VENDOR: Veritext; INVOICE#: 6613027; DATE: 6/1/2023; Proceedings on 05/18/2023.	\$1,319.20
06/01/23	Transcript of Proceedings [E116] VENDOR: Veritext; INVOICE#: 6613461; DATE: 6/1/2023; Procedings on 05/19/2023.	\$1,372.55
06/19/23	Postage [E108] 52 @ \$0.84.	\$43.68
06/20/23	Postage [E108] 52 @ \$2.46.	\$127.92
07/28/23	Postage [E108] 52 @ \$1.11.	\$57.72
08/25/23	Postage [E108] 24 @ \$9.35.	\$224.40
08/25/23	Postage [E108]	\$13.05
08/25/23	Postage [E108]	\$10.95
08/25/23	Postage [E108]	\$10.65
08/25/23	Postage [E108]	\$11.75
08/25/23	Postage [E108]	\$9.35
08/25/23	Postage [E108]	\$9.35
08/25/23	Postage [E108]	\$9.35

TOTAL DISBURSEMENTS	<hr/>	\$11,167.79
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CODE	DESCRIPTION	HOURS	AMOUNT
B100	Administration	279.00	111,879.00
B110	Case Administration	20.35	8,180.00
B130	Asset Disposition	7.30	3,335.00
B140	Relief from Stay / Adequate Protection Proceedings	240.45	95,499.00
B150	Meetings of and Communications with Creditors	4.00	2,000.00
B160	Fee / Employment Applications	5.40	2,175.00
B185	Assumption / Rejection of Leases and Contracts	1.50	690.00
B200	Operations	48.35	19,007.50
B230	Financing / Cash Collections	48.35	19,007.50
B300	Claims and Plan	78.85	28,760.00
B320	Plan and Disclosure Statement (including Business Plan)	78.85	28,760.00

DISB	DESCRIPTION	AMOUNT
E108	Postage	691.61
E111	Meals	42.19
E112	Court Fees	1,738.00
E115	Deposition Transcripts	5,981.14
E116	Trial Transcripts	2,691.75
E124	Other	23.10

TOTAL CUMULATIVE BILLED TO DATE
\$170,814.29